UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

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SHEKEIRA SPRINGER and DONALD WILLIAMS,)	
Plaintiffs,)	
)	Civil Action No. 13-10083-FDS
v.)	
)	
BRUCE GELB, SUPERINTENDENT OF)	
SOUZA-BARANOWSKI CORRECTIONAL)	
CENTER; OSVALDO VIDAL, individually;)	
LT. NESTOR CRUZ, individually; and)	
OFFICER JOHN DOE, individually,)	
·)	
Defendants.)	

PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF VIDEO

Pursuant to Rule 37(a) of the Federal Rules of Civil Procedure and Rule 37.1 of the Local Rules of the District of Massachusetts, Plaintiffs Shekeira Springer and Donald Williams ("Plaintiffs"), hereby move the court for an order compelling Defendants to produce copies of all surveillance video responsive to Request for Production Number 4 within seven days of the entry of the court's order.

In support of this motion, Plaintiffs rely on their Memorandum in Support of Plaintiffs' Motion to Compel Production of Video, the Declaration of M. Frank Bednarz, and its exhibits.

WHEREFORE, Plaintiffs respectfully request the Court to enter an order compelling Defendants to produce copies of all surveillance video responsive to Request for Production Number 4 within seven days of the entry of the court's order.

March 18, 2015

Respectfully submitted,

/s/ M. Frank Bednarz

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Attorneys for Plaintiffs Shekeira Springer and Donald Williams

CERTIFICATION PURSUANT TO LOCAL RULES 7.1(a)(2) and 37.1

I, M. Frank Bednarz, hereby certify that pursuant to Local rules 7.1(a)(2) and 37.1, counsel for Plaintiffs conferred in good faith with opposing counsel in an effort to resolve or narrow the issues presented in the motion prior to filing. The issue could not be resolved or narrowed; Plaintiffs' counsel and Defendants' counsel remain at an impasse regarding the issues described in the instant motion.

March 18, 2015

/s/ M. Frank Bednarz

CERTIFICATE OF SERVICE

I, M. Frank Bednarz, hereby certify that a copy of the foregoing document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on March 18, 2015.

March 18, 2015

/s/M. Frank Bednarz